

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**CARMEN GOMEZ**

**Case No.: 1:13-CV-07395**

**Plaintiff,**

**-against-**

**INOVISION-MEDCLR PORTFOLIO GROUP, LLC.,  
PETER T. ROACH & ASSOCIATES, P.C.,  
KIRSCHENBAUM, PHILLIPS & ROACH, P.C.  
TIMOTHY MURTHA  
LVNV FUNDING, LLC  
RESURGENT CAPITAL SERVICES, LP  
NCO FINANCIAL SYSTEMS, INC.**

**Defendants.**

**DECLARATION IN SUPPORT OF PLAINTIFF’S REPLY MEMORANDUM OF  
LAW IN SUPPORT OF MOTION TO COMPEL DEFENDANTS TO ANSWER  
DEPOSITION QUESTIONS**

[illegible]

NOW COMES Ahmad Keshavarz and pursuant to 28 U.S.C. § 1746, declares under penalty of perjury that the following is true and correct.

1. I am the attorney for Plaintiff.
2. I submit this declaration in support of Plaintiff's Reply Memorandum of Law in Support of Motion to Compel Defendants to Answer Deposition Questions
3. Attached herein is a true and correct copy of the October 25, 2011 Summary Order to Cease and Desist and Summary Suspension of Collection Agency Licenses, Case No. DFR-FY2012-012. Exhibit A.

Dated: Brooklyn, New York  
January 13, 2017

Respectfully submitted,  
/s/

By:

Ahmad Keshavarz  
The Law Office of Ahmad Keshavarz  
ATTORNEY FOR PLAINTIFF  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Edward K. Lenci  
Concepcion A. Montoya  
Sheng Beh  
Nabil G. Foster  
HINSHAW & CULBERTSON LLP  
Attorney for Defendants LVNV Funding, LLC., and Resurgent Capital Services, LP.  
800 Third Avenue, 13th Floor  
New York, New York 10022  
Tel: (212) 471-6200

Dated: Brooklyn, NY  
January 13, 2017

/s/  
Ahmad Keshavarz  
Attorney for Plaintiff